

CAUSE NO. 23-CV-1921

AETNA LIFE INSURANCE CO.,
Plaintiff,

v.

ADDISON OAKS HOLDINGS LLC,
DANIEL HAMANN, EDWARD PRITCHETT §
AND ALLYSON PRITCHETT, §
Defendants. §

IN THE DISTRICT COURT OF

GALVESTON COUNTY, TEXAS

405TH JUDICIAL DISTRICT

RULE 11 AGREEMENT REGARDING JANUARY 2, 2024, FORECLOSURE SALE

Plaintiff, Aetna Life Insurance Co. (“Aetna”) and Defendants, Addison Oaks Holdings, LLC, Edward Pritchett and Allyson Pritchett (“Defendants”) (collectively the “Parties”) enter into this Rule 11 Agreement as follows:

Defendants agree to join Aetna in a motion to the Court to request that the Court set a mid-January 2024 hearing date on Defendants’ application for temporary injunction and Plaintiff’s application for appointment of receivership. Defendants will continue to support the motion through the Court’s ruling on the request.

Aetna agrees that it will not proceed with the foreclosure sale of the Savan Villas Apartments owned by Addison Oaks Holdings, LLC currently scheduled for January 2, 2024.

Respectfully submitted,

HUNTON ANDREWS KURTH LLP

By: /s/ Brian Pidcock

Michael D. Morfey

State Bar No. 24007704

mmofrey@HuntonAK.com

Brian Pidcock

State Bar No. 24074895

brianpidcock@HuntonAK.com

Houston, Texas 77002

Telephone: (713) 220-4200

Fax: (713) 220-4285

ATTORNEYS FOR PLAINTIFF

THE KRUCKEMEYER LAW FIRM

By: /s/Robert Kruckemeyer

Robert J. Kruckemeyer

State Bar No. 11735700

244 Malone Street

Houston, Texas 77007

bob@kruckemeyerlaw.com

Telephone: (713) 600-3473

Fax: (713) 600-7579

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on all counsel of record on December 22, 2023, by electronic filing.

By: /s/Robert Kruckemeyer

Robert J. Kruckemeyer

Automated Certificate of eService

This automated certificate of service was created by the e filing system. The filer served this document via email generated by the e filing system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Robert Kruckemeyer on behalf of Robert Kruckemeyer

Bar No. 11735700

bob@kruckemeyerlaw.com

Envelope ID: 82847539

Filing Code Description: Rule 11 Agreement

Filing Description: Rule 11 Agreement Re 010224 Foreclosure

Status as of 12/22/2023 2:50 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Christopher Johnson	24069999	chris@johnson-attorneys.com	12/22/2023 2:20:53 PM	SENT
Michael ThomasKruckemeyer		mike@kruckemeyerlaw.com	12/22/2023 2:20:53 PM	SENT
Marlene Rangel		mrangel@huntonak.com	12/22/2023 2:20:53 PM	SENT
Jennifer Hornback		jhornback@huntonak.com	12/22/2023 2:20:53 PM	SENT
Colleen McCracken		colleen@johnson-attorneys.com	12/22/2023 2:20:53 PM	SENT
Robert JosephKruckemeyer		bob@kruckemeyerlaw.com	12/22/2023 2:20:53 PM	SENT

Associated Case Party: Daniel Hamann

Name	BarNumber	Email	TimestampSubmitted	Status
Paul J.Zoeller		pzoeller@zoellerlaw.com	12/22/2023 2:20:53 PM	SENT
Misty Pless		mpless@zoellerlaw.com	12/22/2023 2:20:53 PM	SENT

Associated Case Party: Aetna Life Insurance Company

Name	BarNumber	Email	TimestampSubmitted	Status
Michael Morfey		michaelmorfey@huntonak.com	12/22/2023 2:20:53 PM	SENT
Brian C.Pidcock		brianpidcock@huntonak.com	12/22/2023 2:20:53 PM	SENT